

EXHIBIT 4

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Subject: In re PREPA, 17-bk-4780
Date: Monday, July 27, 2020 9:59:12 AM
Attachments: [Exhibit 1 ECF No. 1052 - Receiver Motion Protective Order.pdf](#)
[LUMA PO Stip.DOCX](#)

Counsel –

We are writing with respect to the LUMA administrative expense motion. We have received the discovery served by you on Friday, July 24.

As you know, the parties must present any unresolved discovery disputes in a joint status report due this Tuesday, July 28. We would like to schedule a meet and confer today to address your requests. We can be available anytime today between 12-12:30, 1:30-2, 3-4, or 4:45 to 6.

To help focus the parties' meet and confer discussions, the Government Parties note that discovery regarding the impact of LUMA's administrative expense claim on other claimants and other parties is not relevant to the relief requested in the motion and is outside the scope of the limited issues the Court must consider. Accordingly, the Government Parties object to any discovery requests seeking information regarding the impact of the LUMA contract or of LUMA's administrative expense claim on other parties as overbroad, but we are willing to meet and confer regarding an appropriate scope for these requests.

With respect to the potential objectors' remaining requests, the Government Parties are willing to produce, at a minimum, certain documents exchanged between P3 and LUMA, including drafts of term sheets and contracts; comments from LUMA to the term sheets and contracts, including issues lists; memos to LUMA from P3 regarding LUMA's comments; and minutes of Partnership Committee meetings and written resolutions of the Partnership Committee; to the extent each of those documents is responsive to the potential objectors' discovery requests.

In addition, we are attaching a draft of a protective order for this contested matter. This is the same protective order utilized during the 9019 proceedings, so we are hopeful the parties will be able to quickly reach agreement on its terms. Please let us know if you have any comments.

Many thanks.

Laura Stafford

Associate

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